

**To:** Dravis, Samantha[dravis.samantha@epa.gov]  
**Cc:** Crowther, John J (DNR)[john.crowther@alaska.gov]; Greenwalt, Sarah[greenwalt.sarah@epa.gov]; Wagner, Kenneth[wagner.kenneth@epa.gov]  
**From:** Kelly Johnson  
**Sent:** Fri 9/15/2017 9:03:56 PM  
**Subject:** RE: ARNI Designations - Alaska  
EPA ARNI -may affect- ltr sent to USCOE for ASAP draft SEIS 8.29.17.pdf

Sam - Many thanks for passing me on.

Sarah / Ken – AGDC is putting together information on the particular concerns with the ARNI designation for the Yukon River drainage and I'll get that to you as soon as possible. In the interim, we would like to ensure that Region 10 not take any further action until AGDC / State of Alaska have had a chance to explain to you why the ARNI designation is inappropriate and problematic. On August 29, Region 10 sent a “may affect” letter pursuant to the CWA Section 404(q) MOU between EPA and the Corps. I have attached a copy of that letter. Under the CWA Section 404(q) MOU, the EPA Region 10 Administrator would need to send a “will effect” letter by September 25. AGDC believes it can resolve / address the concerns in the August 29 “may affect” letter so that the “will effect” letter will not be necessary. Thanks so much for your assistance and don't hesitate to contact me. Kelly

**From:** Dravis, Samantha [mailto:dravis.samantha@epa.gov]  
**Sent:** Friday, September 15, 2017 12:55 PM  
**To:** Kelly Johnson  
**Cc:** Crowther, John J (DNR); Greenwalt, Sarah; Wagner, Kenneth  
**Subject:** Re: ARNI Designations - Alaska

Ken Wagner and Sarah Greenwalt are the appropriate individuals. Sarah and Ken, can you reach out and follow up on this? Thank you!

Sent from my iPad

On Sep 14, 2017, at 8:10 AM, Kelly Johnson <KAJohnson@hollandhart.com> wrote:

Samantha – My advance apologies for this out of the blue email but I believe you've had to deal with some Alaska issues during your tenure at EPA. Holland & Hart represents the Alaska Gasline Development Corporation, an entity of the State of Alaska, seeking to construct a natural gas pipeline through Alaska. The permitting for this project (which is included on the Fast-41 Permitting Dashboard) has been ongoing for a number of years. We have run into a situation where EPA Region 10 has indicated that they believe the Yukon River drainage system (approximately 1/4 of the State) may be an Aquatic Resource

of National Importance (ARNI) under the Clean Water Act. AGDC (and I believe the Administration of Governor Walker) strongly disagrees with such a designation. We would like to meet with someone at EPA headquarters to detail the reasons why we believe such a designation is inappropriate. Who would you suggest I coordinate with? I've cc: John Crowther who works in the State of Alaska's DC office since he's been assisting on AGDC issues. Thank you. Kelly

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